

REMARKS/ARGUMENTS

Claims 1-14 and 16-20 are pending in this application. Claims 1-14 and 16-20 are rejected. Claim 15 was previously cancelled.

Claim Rejections – 35 U.S.C. § 102

Claims 1-9, 11, 14 and 16-20 are rejected under 35 U.S.C. § 102(e) as being anticipated by Edmonds, US Pub. No. 2003/0231329.

CLAIMS 1-9 AND 11 DEFINE OVER THE CITED ART.

Edmonds fails to disclose, either expressly or inherently, each and every feature of the claims. Consider claim 1, which is amended merely for clarity, and recites in part:

providing an interface to access a plurality of peripheral devices, the interface being independent of specific features of the peripheral devices and having a plurality of generic routines commonly shared by the peripheral devices;

upon receipt of a request for a feature, ***calling the generic routines as a function of the feature;***

...

executing a native driver of the identified peripheral device; and
performing on the identified peripheral device the specific feature corresponding to the feature requested ***using the executed native driver***

The Office Action, asserts the "generic driver interface" of Edmonds discloses the claimed "interface to access a plurality of peripheral devices," citing paragraphs [0010-0011] of Edmonds. However, Applicants respectfully submit that the generic driver interface of Edmonds cannot disclose, either expressly or inherently, the claimed "interface to access a plurality of peripheral devices ... executing a native driver of the identified peripheral device," as recited in claim 1, because Edmonds generic driver interface uses a generic driver to generate print jobs solely on USB printers. (See, Edmonds at paragraph 23, lines 1-6). That is, Edmonds' generic driver interface does not use the drivers native to the peripheral device.

The Office Action, asserts that Edmonds at paragraph [0021] discloses the claimed "executing a native driver of the identified peripheral device." However, paragraph [0021] discusses a Beacon printer, which Edmonds describes as a network printer interface, not a USB printer interface. The generic driver interface of Edmonds could not field requests to the

Beacon printer, because the Beacon printer, not being connected to a USB port, would not respond to a generic USB printer commands on a USB port.

Furthermore, Edmonds' beacon interface is located at the beacon printer itself. See, for example, paragraph [0018] of Edmonds which discusses that the user must physically walk to the desired beacon printer and select the printer through some interface resident on the printer. Accordingly, Applicants respectfully submit that Edmonds' beacon printer interface fails to disclose the claimed "interface to access a plurality of peripheral devices," because the beacon interface only allows access to the single device which the user has chosen to walk to.

Further still, Edmonds beacon driver "must be capable of translating a print job from an application ***into the appropriate page description language (PDL) for any supported printer.***" (See, Edmonds at paragraph 15, lines 8-10). Accordingly, Applicants respectfully submit that Edmonds beacon interface fails to disclose, either expressly or implicitly, the claimed "providing an interface to access a plurality of peripheral devices ... ***calling the generic routines as a function of the feature,***" because the beacon interface uses a PDL specific to the selected printer. That is, there is no evidence that Edmonds beacon printer interface calls generic routines, instead the beacon driver must call specific routines to translate a print job into the appropriate PDL.

Furthermore, Applicants respectfully submit that neither the beacon printer interface nor the generic USB printer interface of Edmonds disclose the claimed "the interface being ***independent of specific features of the peripheral devices,***" because the beacon printer interface and the generic USB printer interface are both tied to the specific features of a printer.

Accordingly, Edmonds' fails to disclose, either expressly or inherently, the claimed "interface to access a plurality of peripheral devices, the interface being independent of specific features of the peripheral devices ... calling the generic routines as a function of the feature ... executing a native driver of the identified peripheral device; and performing on the identified peripheral device the specific feature corresponding to the feature requested using the executed native driver," because Edmonds' generic USB printer driver interface uses a generic USB printer driver, not the driver native to the peripheral device and Edmonds' beacon printer driver interface only allows access to a single printer and does not call generic routines.

For the foregoing, Applicants respectfully request withdrawal of the rejection to claim 1. Dependent claims 2-9 and 11 refer to independent claims 1 and, therefore, are allowable over this art.

CLAIMS 14 AND 16-20 DEFINE OVER THE CITED ART.

Edmonds fails to disclose, either expressly or inherently, each and every feature of the claims. Consider claim 14, which recites in part:

a mobile computer configured to provide ***an interface used*** by an application to access the at least one peripheral device, to use the interface ***to call a plurality of generic routines*** as a function of a request for a feature, the generic routines ***to cause the native driver, installed on the mobile computer, to execute and control the peripheral device and perform a specific feature corresponding to the feature requested***, the interface being independent of device-specific features of the at least one peripheral device.

As discussed, Edmonds fails to disclose, either expressly or inherently, using a interface to call a plurality of generic routines to cause a native driver of a peripheral device to perform a feature. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection. Dependent claims 16-20 refer to independent claims 14 and, therefore, are allowable over this art.

Claim Rejections – 35 U.S.C. § 103

Claims 12-13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Edmonds, US Pub. No. 2003/0231329 in view of Lemon, US Patent No. 5,379,431.

The cited references, even if considered together, fail to disclose, either expressly or implicitly, each and every feature of the claims. Consider claim 12, which is merely amended for clarity, and which recites, in part:

providing ***a connection class to include generic routines to connect to peripheral devices***, the connection class to be independent of device-specific features of the peripheral devices;

...

using the instantiated object to ***cause a native driver of the requested peripheral device to execute***, and

connecting, through the native driver, the computer to the requested peripheral device

As discussed, Edmonds discusses a USB printer driver, having a generic driver interface, interfacing with a generic driver to generate a print job. That is, Edmonds fails to disclose, either expressly or implicitly, the claimed "object to cause a native driver of the requested peripheral device to execute," as recited in claim 12, because Edmonds uses a generic driver. Further, the Office Action merely relies upon Lemon to discuss object oriented programming.

Applicants respectfully submit that there is no evidence that one of ordinary skill in the art would have combined Edmonds' generic driver interface using generic drivers and Lemon's disclosure of object oriented programming, and modified the combination to include the claimed "providing ***a connection class to include generic routines to connect to peripheral devices***, the connection class to be independent of device-specific features of the peripheral devices; ...using the instantiated object to ***cause a native driver of the requested peripheral device to execute***, and ***connecting, through the native driver***, the computer to the requested peripheral device," as recited in claim 12.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection. Dependent claim 13 refers to independent claim 12, and, therefore, is allowable over the cited references.

Claim 10 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Edmonds, US Pub. No. 2003/0231329 in view of Dorris, US Patent No. 5,867,710.

Dependent claim 10 refers to independent claim 1, and, therefore, is allowable over the cited references.

CONCLUSION

For all the above reasons, the applicants respectfully submit that this application is in condition for allowance. A Notice of Allowance is earnestly solicited.


The Examiner is invited to contact the undersigned at (202) 220-4200 to discuss any matter concerning this application.

The Office is authorized to charge any underpayment or credit any overpayment to Kenyon & Kenyon LLP's Deposit Account No. 11-0600.

Respectfully submitted,

KENYON & KENYON LLP

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